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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GVCL VENTURES, INC., a corporation,

Plaintiff,

vs.

GOPETFRIENDLY.COM, LLC, a limited
liability company; DOES I-X inclusive; and
ROE CORPORATIONS XX-XXX, inclusive,

Defendants,

GOPETFRIENDLY.COM, LLC, a limited
liability company,

Counterclaim-plaintiff,

v.

GVCL VENTURES, INC., a Delaware
corporation; REGISTERED EXPRESS
CORPORATION, a Nevada corporation;
REGISTERED EXPRESS
INTERNATIONAL CORPORATION, a
Nevada corporation; PROACTIVE PET

Case Number: 2:16-cv-02892

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
MOTION TO ENFORCE
SETTLEMENT
(FIRST REQUEST)**

1 PRODUCTS, INC., a Nevada corporation;
2 DIGITAL AIRO, INC., a Nevada
3 corporation; JOHN TAYLOR, an individual;
4 MIKE DILLON, an individual; GERALD
5 NEZIOL, an individual; DOES I-X, inclusive;
6 and ROE CORPORATIONS I-X, inclusive,

Counterclaim-defendants.

7 Plaintiff and counterclaim-defendant GVCL Ventures, Inc. ("GVCL") and counterclaim-
8 defendant Gerald Neziol ("Neziol"), through their counsel of record, the Law Office of Shawn
9 Perez, and defendant and counterclaim-plaintiff GoPetFriendly.com, LLC ("GoPetFriendly"),
10 through its counsel of record, the law firm of Marquis Aurbach Coffing, hereby stipulate and
11 agree as follows:

12 1. On July 19, 2019, a status hearing was held before Magistrate Judge Cam
13 Ferenbach regarding the status of this case;

14 2. During that hearing, the parties informed the Court that a settlement had been
15 reached and that GoPetFriendly would be filing a motion to enforce the settlement;

16 3. GoPetFriendly's counsel informed the Court that he had an upcoming jury trial in
17 state court and that due to that trial, he would not be able to immediately file that motion;

18 4. As a result, during that hearing and in the Court's subsequent minutes, the Court
19 set a deadline of August 15, 2019, for the filing of the motion to enforce the settlement;

20 5. Unexpectedly, GoPetFriendly's counsel's jury trial took longer than anticipated
21 and did not conclude until late last week;

22 6. In addition, after the Court's status hearing, GoPetFriendly's counsel realized that
23 the deadline for GVCL and Neziol to make certain settlement payments runs on August 17,
24 2019, two days after the deadline set for the filing of the motion to enforce, thereby potentially
25 making the filing of such a motion premature on August 15, 2019;

26 7. Accordingly, due to the above-identified circumstances, the parties stipulate and
27 agree to extend the time for GoPetFriendly to file the motion to enforce the settlement to
28 September 5, 2019.

1 8. This is the first stipulation for an extension of time to file the motion to enforce
2 the settlement.

3 9. This stipulation is not entered into for any improper purpose or to delay.

4 IT IS SO STIPULATED.

5 Dated this 15th day of August, 2019.

Dated this 15th day of August, 2019.

6 MARQUIS AURBACH COFFING

LAW OFFICE OF SHAWN PEREZ

7 /s/ Chad F. Clement

/s/ Shawn Perez

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and Gerald Neziol

13 **ORDER**

14 **IT IS SO ORDERED.**

15 GoPetFriendly's new deadline to file the motion to enforce the settlement shall be
16 September 5, 2019.

17 Dated this 15th day of August, 2019.

18 

19
20 UNITED STATES MAGISTRATE JUDGE